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8 *Attorney for Defendants, L&T International Corporation
9 and L&T Group of Companies, Ltd..*

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UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS

U.S. EQUAL EMPLOYMENT) Civil Action No. 07-0029
OPPORTUNITY COMMISSION,)
Plaintiff,)
vs.) ANSWER TO COMPLAINT
L&T INTERNATIONAL CORPORATION;) AND DEMAND FOR
L&T GROUP OF COMPANIES, LTD., TAN) JURY TRIAL
HOLDINGS CORPORATION; TAN)
HOLDINGS OVERSEAS INCORPORATED;)
CONCORDE GARMENT MANUFACTURING)
CORPORATION; and DOES 1-5)
Inclusive,)
Defendants.)

COMES NOW, Defendants, L&T International Corporation and L&T Group of Companies
Ltd., ("Answering Defendants") through their attorneys of record to answer the Complaint as follows:

1. Answering Defendants admit each and every allegation contained in paragraph number 1
of the Complaint. .

1 2. Answering Defendants admit each and every allegation contained in paragraph number 2
2 of the Complaint. .

3 3. Answering Defendants admit each and every allegation contained in paragraph number
4 3 of the Complaint. .

5 4. Answering Defendants admit each and every allegation contained in paragraph number 4
6 of the Complaint.

7 5. Answering Defendants deny each and every allegation contained in paragraph number 5
8 of the Complaint.

9 6. Answering Defendants admit each and every allegation contained in paragraph number 6
10 of the Complaint.

11 7. Answering Defendants deny each and every allegation contained in paragraph number 7
12 of the Complaint.

13 8. Answering Defendants deny each and every allegation contained in paragraph number 8
14 of the Complaint.

15 9. Answering Defendants admit each and every allegation contained in paragraph number 9
16 of the Complaint.

17 10. Answering Defendants have insufficient information to form a belief as to the truth of
18 paragraph 10 of Plaintiff's Complaint and placing their denial on that ground, deny the allegations and
19 each of them and requires strict proof thereof.

20 11. Answering Defendants have insufficient information to form a belief as to the truth of
21 paragraph 11 of Plaintiff's Complaint and placing their denial on that ground, deny the allegations and
22 each of them and requires strict proof thereof.

12. Answering Defendants have insufficient information to form a belief as to the truth of paragraph 12 of Plaintiff's Complaint and placing their denial on that ground, deny the allegations and each of them and requires strict proof thereof.

13. Answering Defendants admit that more than thirty days prior to the institution of this lawsuit, Marlou Aranda and 81 additional Charging Parties filed a charge with the Commission alleging violations of Title VII. Except as expressly admitted Answering Defendants have insufficient information to form a belief as to the truth of paragraph 13 of Plaintiff's Complaint and placing their denial on that ground, deny the allegations and each of them and requires strict proof thereof.

14. Answering Defendants deny each and every allegation contained in paragraph number 14 of the Complaint.

15. Answering Defendants deny each and every allegation contained in paragraph number 15
of the Complaint.

16. Answering Defendants deny each and every allegation contained in paragraph number 16
of the Complaint.

17. Answering Defendants deny each and every allegation contained in paragraph number 17
of the Complaint.

GENERAL DENIAL

Except for those facts expressly admitted, Answering Defendants generally deny all allegations in the Complaint.

AFFIRMATIVE DEFENSES

1. As a First Affirmative Defense, Plaintiff fails to state a claim upon a relief can be granted.

- 1 2. As a Second Affirmative Defense, Plaintiff's claims are barred by Waiver.
- 2 3. As a Third Affirmative Defense, Plaintiff's claims are barred by Estoppel.
- 3 4. As a Fourth Affirmative Defense, Plaintiff's claims are barred by Unclean Hands.
- 4 5. As a Fifth Affirmative Defense, Answering Defendants acted in good faith at all
5 relevant times.
- 6 6. As a Sixth Affirmative Defense, Plaintiff's claims are barred by Statute of Limitations.
- 7 7. As a Seventh Affirmative Defense, Plaintiff's claims are barred by Laches.
- 8 8. As an Eight Affirmative Defense, Plaintiff's claims are limited because the Charging
8 Parties did not suffer damage or because of they failed to mitigate damages.
- 9 9. As a Ninth Affirmative Defense, Answering Defendants' had a legitimate business
10 reason for terminating Charging Parties' employment.

12 **DEMAND FOR JURY**

14 The Answering Defendants hereby demand that this case be tried before a jury.

16 **WHEREFORE, DEFENDANTS PRAY THAT:**

- 17 1. Plaintiff take nothing by its complaint;
- 18 2. Answering Defendants be awarded costs of this action and reasonable attorney's fees;
19 and
- 20 3. For such further relief as the Court deems just and proper.

22 Dated this 14th day of January, 2008.

24

/s/
25 **COLIN M. THOMPSON, ESQ.**
Attorney at Law